

RECEIVED

DOCKET FILE COPY ORIGINAL

NOV.- 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20534

In the Matter of)
)
Guidelines for Evaluating the) ET Docket No. 93-62
Environmental Effects of)
Radiofrequency Radiation)

MOTION FOR EXTENSION OF TIME

CBS Inc. ("CBS") and Capital Cities/ABC Inc. ("Capital Cities"), the licensees of AM, FM and television broadcast stations, hereby respectfully request that the time for filing comments and reply comments in response to the Commission's *Notice of Proposed Rulemaking* ("Notice") in the instant proceeding be extended for a period of 60 days. Comments and reply comments are presently due on November 12, 1993, and December 13, 1993, respectively.

In its *Notice*, the Commission states that "[it] is difficult to measure the exact impact on the broadcast community [of the new ANSI/IEEE standard] due to the complexity of [that] standard and the relative lack of information on how certain

No. of Copies rec'd
List ABCDE

1 copy

aspects of the new guidelines can be implemented with respect to broadcast stations." In particular, the Commission acknowledges uncertainty as to the effect of the new proposed induced current standard on broadcasters, and the impact of the guidelines at multiple-user sites. *Notice* at Appendix B.

CBS and Capital Cities respectfully submit that additional time is necessary for analysis and comment on the vital issues thus recognized by the Commission. As indicated below, new information with respect to these issues has only recently become available -- information which significantly bears on the impact of the proposed regulation on existing facilities, and the manner in which any new guidelines should be implemented. Granting the requested extension would ensure that the Commission will have the benefit of the broadcast industry's informed analysis of this information in considering the very complex issues presented by the instant rulemaking.

In this connection, we note that the Commission previously granted an extension to the National Association of Broadcasters ("NAB") to allow completion of a theoretical study to develop non-measurement-based techniques for complying with the proposed guidelines. That study was completed by Jules Cohen, the NAB's consulting engineer,

only a few weeks ago.* While it has not yet been possible fully to evaluate Mr. Cohen's study, preliminary assessments of his work appear to indicate that adoption of the proposed guidelines -- particularly those pertaining to induced currents -- may very significantly increase the stringency of the Commission's present rules as to RF radiation exposure. Based on these preliminary assessments, it appears that adoption of the standards may result in substantial compliance difficulties for broadcasters, particularly those at multiple-user sites. Moreover, other recent studies also suggest that the proposed guidelines may have significant impact on broadcasters.**

Additional time is necessary for broadcasters to consider the implications of Mr. Cohen's work and other recent studies, both to determine whether further study of the issues raised in this rulemaking is required, and to assess the effect that the proposed guidelines --

* Mr. Cohen's work seeks to modify the graphs, tables and charts in the Commission's existing *OST Bulletin No. 65; Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation*.

** See, S. Tofani et al, Induced Foot-Currents in Humans Exposed to Radio-Frequency EM Fields, which was recently submitted for publication in *IEEE Transactions*.

particularly the induced current standard -- may have on their operations. Among other things, broadcasters may wish to begin conducting field measurements to evaluate whether Mr. Cohen's theoretical findings as to the induced currents produced by RF fields are borne out in actual practice.* Without further study, it will be impossible to know with any degree of certainty what the impact of the proposed new standard will be on existing facilities. Such information is, we submit, essential to the Commission's evaluation of the proposed new regulation, and the schedule for its implementation if it is adopted.

Since long-accepted regulations governing human exposure to RF radiation are currently in place, adoption of the proposed new standard is deserving of consideration on the fullest possible record. The availability, in the initial round of comments, of the analyses and studies developed

* In this connection, we note that meters intended to measure induced current are not now readily available. Only one company -- Holaday -- has begun manufacturing such a meter, while another -- Narda -- has developed a prototype. To date, CBS technical personnel have been unsuccessful in acquiring a meter from either source. Thus it has until now been impossible for broadcasters to evaluate the impact of the induced current standard on their operations based on actual measurements. In this connection, we also note, that meters measuring contact currents at frequencies of interest are not now commercially available.

during the extension period will enable the Commission better to consider adoption of the proposed guidelines, and will afford other parties the opportunity to file more meaningful reply comments. Accordingly, we respectfully request that the proposed extension be granted.

Respectfully submitted,

CBS INC.
51 West 52 Street
New York, NY 10019

By Howard J. Jaekel
Howard Jaekel
By Michael Rose
Michael Rose

Its Attorneys

CAPITAL CITIES/ABC INC.
77 West 66th Street
New York, NY 10023

By Roger Goodspeed
Roger Goodspeed

Its Attorney

November 2, 1993

110293

- 5 -

LICMER311/11